



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
CINCINNATI, OHIO 45268

August 3, 2012

Laura Marshall  
Ohio EPA  
401 East Fifth Street  
Dayton, OH 45402-2911

**RE: South Dayton Dump Site, Moraine, OH**

Dear Laura:

In a letter dated July 17, 2012, the Ohio EPA expressed concerns about the risk to human health from indoor air exposure to VOCs and the risk of explosive conditions from landfill gas. Ohio EPA noted the SSD site as a threat to the on-site and surrounding businesses and residences, and supports the U.S. EPA's Remedial branch's request for assistance from the Removal branch in evaluating options for addressing current and potential vapor intrusion risks at the South Dayton Dump and Landfill site. The U.S. EPA is planning to undertake the following actions to mitigate threats posed by the presence hazardous waste at the South Dayton Dump Site:

- 1) Develop and implement a Site Health and Safety Plan,
- 2) Conduct subsurface gas extent of contamination sampling utilizing groundwater, soil gas, sub-slab, and indoor air sampling techniques.
- 3) If the ODH Sub-slab Air Screening Level for a contaminant of concern (TCE, etc) is exceeded for off-site residential structures, design and install interior vapor abatement mitigation systems in structures impacted by subsurface gas migration. Abatement systems will include installation of a sub-slab depressurization system or crawl space depressurization system, sealing cracks in walls and floors of the basement, and sealing or fixing drains that could be a pathway.
- 4) To prevent landfill gas migration off-site and prevent explosive methane vapors from accumulating below on-site buildings, design and install a perimeter landfill gas extraction system that is manifolded to on-site building sub-slab depressurization systems.

- 5) Develop and implement a vapor abatement system performance sample plan to confirm that ATSDR indoor health standards are achieved for contaminants of concern following installation of interior systems.
- 6) Develop and implement a perimeter landfill gas extraction system performance sample plan including the installation of perimeter subsurface probes.
- 7) Develop and implement a perimeter landfill gas extraction system effluent sample plan.

It is U.S. EPA Region V's policy to request that the Ohio EPA identify any State applicable or relevant and appropriate requirements (ARARs) which apply to this removal action. Any ARARs which you identify within 30 days will be complied with to the extent practicable. If you have any questions or comments, please contact me at 513-569-7539.

Sincerely,

A handwritten signature in dark ink, appearing to read 'SKIR' followed by a long horizontal stroke that ends in a small upward hook.

Steven L. Renninger  
On-Scene Coordinator

cc: site file